

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss with prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41. No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Edward Robinson

Edward Robinson
Cannon & Dunphy
P. O. Box 1750
Brookfield, WI 53008
(262) 796-3706
erobinson@cannon-dunphy.com
Counsel for Plaintiffs

/s/ William M. Gage

William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com
Counsel for the Ethicon Defendants

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A

<i>Civil Action No.</i>	<i>Case Name</i>
2:13-cv-31616	Deborah Friedrich, et al v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-31609	Elizabeth A. Johnson; David Johnson vs. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:14-cv-21040	Lee Ann Kwiatkowski; David Kwiatkowski vs. Ethicon, Inc.; Johnson & Johnson
2:13-cv-31239	Rhonda Mesnard, et al v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-31614	Shannon Bristol ; vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:14-cv-27066	Tina Klotz vs. Ethicon, Inc.; Johnson & Johnson